



executed dismissal papers within 60 days of the date of the Order. The current deadline for the parties to submit dismissal documents is February 1, 2020. Following settlement of the case, Defendant retained bankruptcy counsel to ensure that the settlement comports with the Court's automatic stay, is made in conformance with Plaintiff's bankruptcy filing, and is approved by the bankruptcy court. Defendant's bankruptcy counsel requires additional time to confer with the trustee to ensure that these measures are met. Accordingly, Defendant respectfully requests an extension of the current deadline to file dismissal papers by thirty (30) days.

BASED ON THE FOREGOING, Defendant Ciara Financial Services, Inc., improperly named Ciara Financial Services Inc. d/b/a Clay Cooley Auto Group, requests that this Unopposed Motion for Extension of Deadline to File Dismissal Documents be granted that the deadline be extended by thirty (30) days.

Respectfully submitted,

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**ATTORNEYS FOR DEFENDANT CIARA  
FINANCIAL SERVICES, INC.**

**CERTIFICATE OF CONFERENCE**

On January 29, 2020, counsel for Defendant conferred with counsel for Plaintiff regarding this Motion for Extension of Deadline to File Dismissal Documents and counsel is unopposed to the Motion.

/s/Anne-Alise “Ali” Fritsche  
Barry A. Moscowitz  
Anne-Alise “Ali” Fritsche

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing document has been served upon all counsel of record on the 29th day of January 2020 by electronic service:

/s/Anne-Alise “Ali” Fritsche  
Barry A. Moscowitz  
Anne-Alise “Ali” Fritsche